

Maurice VerStandig, Esq.
Nevada Bar No.: 15346
THE VERSTANDIG LAW FIRM, LLC
1452 W. Horizon Ridge Pkwy, #665
Henderson, NV 89012
Telephone: (301)444-4600
Facsimile: (301)444-4600
Email: mac@mbvesq.com

Attorneys for Frederick Scott Fischer

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FREDERICK SCOTT FISCHER,) Case No. 2:20-cv-00339-APG-DJA
)
Plaintiff,) STIPULATION AND ORDER TO
) EXTEND DISCOVERY (Second
) Request)
v.)
)
FULL SPECTUM LASER LLC,)
)
)
Defendant.)

IT IS HEREBY STIPULATED AND AGREED, by and between the parties' counsel of record, that discovery deadlines in the Scheduling Order (ECF No. 16) be extended sixty (60) days as follows:

Discovery Deadline	March 26, 2021
Dispositive Motion Deadline	April 26, 2021 (April 25 is a Sunday)
Joint Pretrial Order	May 25, 2021 or 30 days from the ruling on a dispositive motion

This is the second request for an extension of these deadlines. The parties provide the following information to the Court regarding the proposed extension of the discovery deadline.

Discovery Completed To Date

The parties have exchanged initial disclosures and initial rounds of written discovery, with counsel for the parties engaging in a series of substantive conversations concerning future discovery and the appropriate order in which the same should be taken.

Remaining Discovery To Be Completed

The parties anticipate issuing second rounds of written discovery, engaging in limited third party subpoena practice, and then conducting depositions.

Reasons Discovery Could Not Be Completed Within The Existing Deadline

The parties continue to make progress in this matter, but their respective counsel have experienced various practice-centric delays correlative to the COVID-19 pandemic and, more specifically, its ongoing (and varying) impact on litigation in various courts. Counsel for one of the parties became personally ill with COVID-19.

This is the parties' second request for an extension of the discovery deadline date and is not made to delay this matter. Based upon the foregoing, the parties believe there is good cause for the requested extension.

/

/

/

/

/

/

/

/

1 This is the second request for an extension of these deadlines.

2 FISHER & PHILLIPS LLP

THE VERSTANDIG LAW FIRM, LLC

3 /s/ Brian L. Bradford (signed w/ express
4 permission)

5 BRIAN L. BRADFORD, ESQ.
6 300 South Fourth Street
7 Suite 1500
Las Vegas, Nevada 89101
Attorneys for Defendant
Full Spectrum Laser LLC

/s/ Maurice B. VerStandig

Maurice VerStandig, Esq.
1452 W. Horizon Ridge Pkwy, #665
Henderson, NV 89012
Attorney for Plaintiff
F. Scott Fischer

8
9
10 IT IS SO ORDERED:



11 UNITED STATES MAGISTRATE JUDGE

12 Dated: December 17, 2020
13
14
15
16
17
18
19
20
21
22
23
24